UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Plaintiff,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant,

and

ADVENT INTERNATIONAL CORPORATION,

Counterclaim-Plaintiff,

v.

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Counterclaim-Defendant.

Civil Action No. 23-cv-10684

JOINT MOTION FOR THE ISSUANCE OF LETTERS ROGATORY PURSUANT TO THE HAGUE EVIDENCE CONVENTION

Pursuant to 28 U.S.C. § 1781, Rule 28(b) of the Federal Rules of Civil Procedure, and the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, Mar. 18, 1970, 23 U.S.T. 2555, T.I.A.S. No. 7444 ("Hague Convention"), Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. de C.V. and Defendant and Counterclaim-Plaintiff Advent International Corp., respectfully request that the Court issue the Letters of Request (the "Letters") attached as Exhibits A–T to the Declaration of Gabriel F. Soledad for the purpose of compelling the production of documents and testimony from a number of non-parties located in Mexico. As detailed in the Memorandum of Law accompanying this motion, those non-parties are in possession of highly relevant discovery concerning both Parties' allegations and claims in this case.

Dated: June 23, 2023 Respectfully submitted,

/s/ Carlos M. Sires

Carlos M. Sires Jason Hilborn

BOIES SCHILLER FLEXNER LLP 401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301 Telephone: (954) 356-0011 Facsimile: (954) 356-0022

csires@bsfllp.com jhilborn@bsfllp.com

David Boies

BOIES SCHILLER FLEXNER LLP

333 Main Street Armonk, NY 10504

Telephone: (914) 749-8200 Facsimile: (914) 749-8300 dboies@bsfllp.com

Michael Aleo Thomas Lesser

LESSER, NEWMAN, ALEO & NASSER LLP 39 Main Street, Suite 1

Northampton, MA 01060 Telephone (413) 584-7331 Facsimile: (413) 586-7076 aleo@LNN-law.com

lesser@LNN-law.com

Counsel for Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. de C.V.

/s/ Andrew J. Rossman

Peter L. Welsh (No. 643261) Daniel V. Ward (No. 667158) **ROPES & GRAY LLP Prudential Tower** 800 Boylston Street Boston, MA 02199 (617) 951-7050

Peter.Welsh@ropesgray.com Daniel.Ward@ropesgray.com

Andrew J. Rossman (admitted *pro hac vice*) Nicholas A. S. Hoy (admitted *pro hac vice*) QUINN EMANUEL URQUHART &

SULLIVAN, LLP

51 Madison Avenue, 22nd Floor New York, New York 10010

(212) 849-7000

andrewrossman@quinnemanuel.com nicholashoy@quinnemanuel.com

Gabriel F. Soledad (admitted *pro hac vice*) QUINN EMANUEL URQUHART &

SULLIVAN, LLP 1300 I Street NW Washington, D.C. 20005

(202) 538-8000

gabrielsoledad@quinnemanuel.com

Counsel for Defendant and Counterclaim-Plaintiff Advent International Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June, 2023, I caused to be served a copy of the foregoing document via the CM/ECF system on all counsel of record.

/s/ Andrew J. Rossman

Andrew J. Rossman Counsel for Defendant and Counterclaim-Plaintiff AIC